

# Playtex

Playtex Products, Inc.

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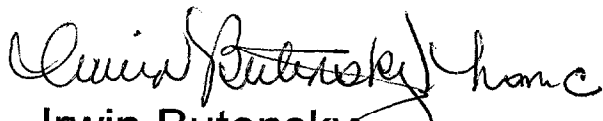
September 6, 2000

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20857

Dear Sir or Madam:

On behalf of Playtex Products, Inc. we submit the attached Gantt chart as a supplement to the comments filed by Playtex on August 28, 2000. Specifically, it is intended to graphically depict the timetable which appears on page 5 of those comments. As one of the largest sunscreen manufacturers in the U. S., Playtex has many years of innovative product development and testing. This experience, set out in the timetable and Gantt chart, demonstrates the length of time necessary to retest and/or reformulate seasonal sunscreen products as a result of any changes to the final monograph for sunscreens. As Playtex also indicated in its earlier comments, the effective date period advanced by FDA does not take into account the unique nature of a product line which in part is only manufactured and sold at particular times of the year and which is distributed in two year selling cycles. When these unique aspects are taken into consideration, it is possible to see from the enclosed chart that the industry will need approximately 18 months in addition to the 12 months period originally proposed by FDA to implement the new sunscreen monograph.

Sincerely yours,

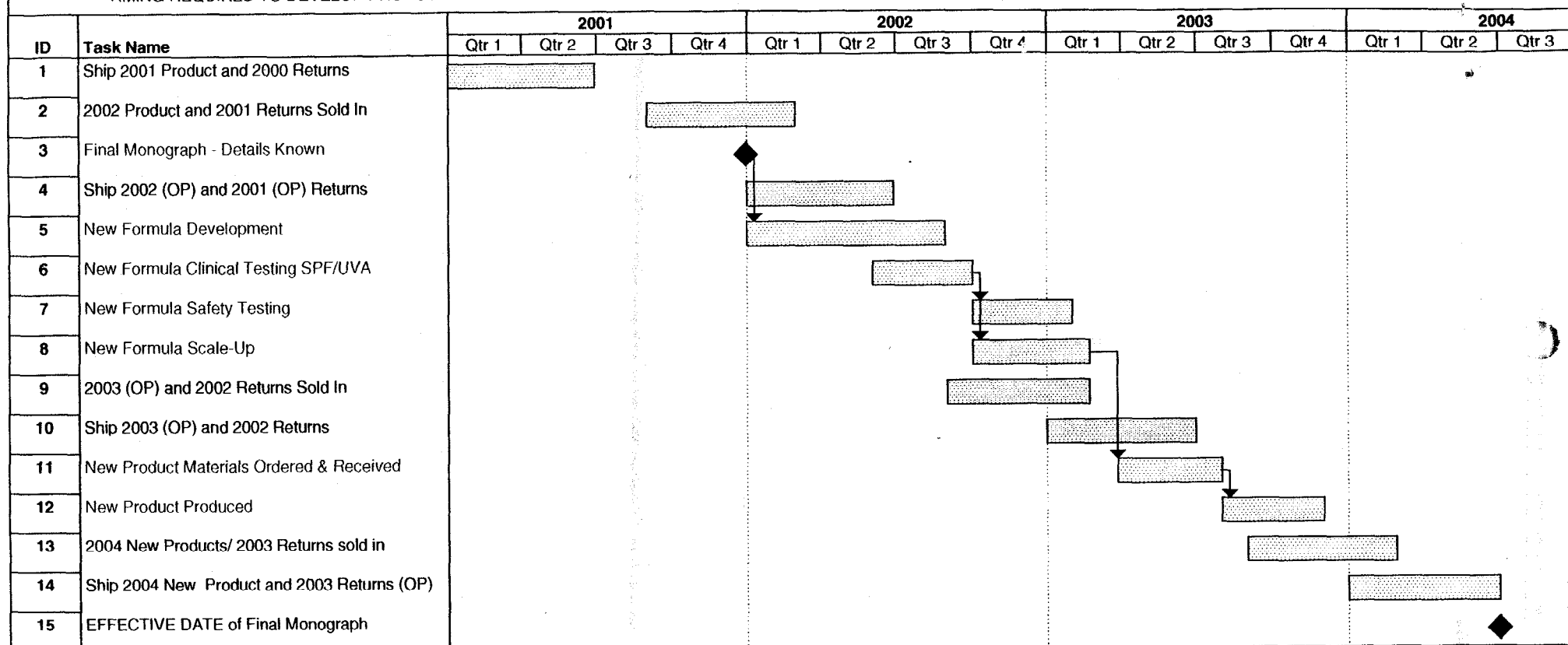
  
Irwin Butensky

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**TIMING REQUIRED TO DEVELOP PRODUCTS THAT MEET THE REQUIREMENTS OF THE FINAL MONOGRAPH AND ALLOW OF SHIPMENT OF THE PREVIOUS YEAR'S RETURNS**



Project: FDABBTIM  
Date: Fri 09/01/00

Task



Rolled Up Task



Project Summary



Progress



Rolled Up Milestone



Split



Milestone



Rolled Up Progress



Rolled Up Split



Summary



External Tasks

